

**Federal Defenders  
OF NEW YORK, INC.**

Southern District  
81 Main Street, Suite 300  
White Plains, N.Y. 10601-4150  
Tel: (914) 428-7124 Fax: (914) 948-5109

David E. Patton  
*Executive Director  
and Attorney-in-Chief*

*Southern District of New York  
Jennifer L. Brown  
Attorney-in-Charge*

September 17, 2020

**BY ECF**

The Honorable Judge Nelson S. Roman  
United States District Judge  
Southern District of New York  
300 Quarropas Street  
White Plains, NY 10601

**Re: United States v. Vania Bell  
19 Cr. 550 (NSR)**

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #: \_\_\_\_\_  
DATE FILED: 9/18/2020 \_\_\_\_\_

Dear Judge Roman:

This letter is written on the behalf of Ms. Vania Bell and respectfully requests that this Court modify Ms. Bell's bail conditions. Specifically, Ms. Bell requests that the Court allow Ms. Bell to travel to Lancaster, Pennsylvania on September 18, 2020 and return to her home in New Jersey on September 20, 2020. Ms. Bell is going to Lancaster, Pennsylvania in order to get a service dog for her daughter who suffers from severe anxiety, depression and ADHD. The adoption of the dog is to assist Ms. Bell's daughter with her emotional and mental health.

On August 1, 2019, Ms. Bell was released on bond. She is currently on pretrial supervision. Her pretrial service officer, Mr. Winter Pascual and the government have no objection to this travel request. Thank you for your consideration of this matter.

Respectfully submitted,


/s/  
Susanne Brody  
Assistant Federal Defender  
(914) 428-7133

cc: Margery Beth Feizing, AUSA  
Vladislav Vainberg, AUSA  
Winter Pascual, USPTSO  
Ms. Vania Bell

The modification request is granted on consent of the Government and Pretrial Services as set forth above. The Clerk of the Court is respectfully instructed to terminate the motion at ECF No. 24.

Dated: 9/18/2020  
White Plains, NY

**SO ORDERED:**

  
HON. NELSON S. ROMAN  
UNITED STATES DISTRICT JUDGE